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March 6, 2014

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FCC Mail Room

VIA UPS, Next Day Air

Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attn: Caitlin Vogus

RE:

Off Beat Productions, Inc. 1334

Case Identifier CGB-0478

Docket No. 06-181

Dear Ms. Vogus:

Pursuant to your most recent correspondence dated February 27, 2014 and our communications on March 4, 2014, I am hereby identifying the information and documentation that was previously submitted under cover dated February 10, 2014. It is my understanding that the information submitted herein will be accepted as the basis for a new petition for exemption from the rules concerning closed captioning under 47 CFR §79.1.

In my prior submission dated February 10, 2014, I provided the following documentation organized as follows:

- 1. Exhibit A- Name of the programming for which an exemption is requested
- 2. Exhibit B- The nature and cost of the closed captions for the programming
- 3. Exhibit C- The impact of captioning on programming activities
- 4. Exhibit D- Financial Resources
- 5. Exhibit E- Type of Operations
- Exhibit F- Signed Declaration

I also reiterated that Off Beat Productions has been providing programming first to WKBW-TV-DT and unaffiliated stations, and now WBBZ-TV, for nearly 20 years. They have been able to air "Off Beat Cinema" only because they have been exempt from the closed captioning requirement.

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If they are no longer exempt from that requirement, then Off Beat Productions will not be able to operate. They hope to be able to continue producing programming in the future.

Lastly, documents were submitted on June 29, 2012. I am enclosing a complete a copy of same, with attached exhibits for incorporation into the new petition.

Thank you again for your assistance with this matter. I appreciate your courtesy.

Please feel free to contact me with any questions.

Very truly yours,

Lipsitz Green Scime Cambria, LLP

Barry Nelson Cover, Esq.

BNC/rmg Enclosures